

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

STUDENTS FOR FAIR ADMISSIONS,

Plaintiff,

v.

UNIVERSITY OF TEXAS AT AUSTIN; JAMES B. MILLIKEN, Chancellor of the University of Texas System in his Official Capacity; STEVEN LESLIE, Executive Vice Chancellor for Academic Affairs of the University of Texas System in his Official Capacity; DANIEL H. SHARPHORN, Vice Chancellor and General Counsel of the University of Texas System in his Official Capacity; JAY HARTZELL, Interim President of the University of Texas at Austin in his Official Capacity; BOARD OF REGENTS OF THE TEXAS STATE UNIVERSITY SYSTEM; DAVID J. BECK, CHRISTINA MELTON CRAIN, KEVIN P. ELTIFE, R. STEVEN HICKS, JODIE LEE JILES, JANIECE LONGORIA, NOLAN PEREZ, KELCY L. WARREN, AND JAMES C. "RAD" WEAVER, as Members of the Board of Regents in Their Official Capacities; DANIEL JAFFE, Interim Executive Vice President and Provost; RACHELLE HERNANDEZ, Senior Vice Provost for Enrollment Management and Student Success; and MIGUEL WASIELEWSKI, Executive Director for Office of Admissions,

Defendants.

Case No. 1:20-cv-00763-RP

PROPOSED DEFENDANT-INTERVENORS' MOTION TO EXTEND PAGE LIMIT

Proposed Defendant-Intervenors hereby move for leave to file a Memorandum in Support of Proposed Defendant-Intervenors' Motion to Intervene that is in excess of the ten-page limit set

forth in Local Rule CV-7(e)(3). Proposed Defendant-Intervenors consist of eight students—Adaylin Alvarez, Morgan Bennett, Brianna Mallorie McBride, Liz Kufour, Desiree Ortega-Santiago, Nima Rahman, Alexandra Trujillo, and Rosaleen Xiong—and three student organizations—the Texas National Association for the Advancement of Colored People, the Black Student Alliance, and the Texas Orange Jackets. Because each would be entitled to intervene in their own right, granting this motion promotes judicial economy by allowing the consolidation of many motions to intervene into one motion.

The consolidated Memorandum in Support of Proposed Defendant-Intervenors' Motion to Intervene is fifteen pages in length. Proposed Defendant-Intervenors submit that an additional five pages of briefing is necessary to describe their varied backgrounds and contributions to this litigation in sufficient detail to support their request to intervene under Rule 24 of the Federal Rules of Civil Procedure. Counsel for the current parties to this litigation have indicated that they do not oppose this Motion to Extend Page Limit. A proposed order is attached as Exhibit A.

So dated this 16th day of December, 2020.

/s/ Brian C. Pidcock

Brian C. Pidcock
State Bar No. 24074895
HUNTON ANDREWS KURTH LLP
600 Travis St.
Houston, TX 77002
Tel. 713-220-4200
brianpidcock@huntonak.com

David Hinojosa
State Bar No. 24010689
(*W.D. Tex. application pending submission*)
Genevieve Bonadies Torres*
**LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW**
1500 K Street, NW, Suite 900
Washington, DC 20005

Tel. (202) 662-8600
dhinojosa@lawyerscommittee.org
gbonadies@lawyerscommittee.org

Ryan P. Phair*
Carter C. Simpson*
HUNTON ANDREWS KURTH LLP
2200 Pennsylvania Avenue, NW
Washington, D.C. 20037
Tel. (202) 955-1500
rphair@huntonak.com
csimpson@huntonak.com

Alan R. Kabat*
BERNABEI & KABAT PLLC
1400 - 16th Street, N.W., Suite 500
Washington, D.C. 20036-2223
Tel. (202) 745-1942 (ext. 242)
Kabat@BernabeiPLLC.com

**Pro hac vice application pending*

*Attorneys for proposed Student and
Organizational Defendant-Intervenors*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on counsel of record for Plaintiff via the Court's electronic filing and service system and also via email service as indicated below, on this the 16th day of December, 2020, as follows:

William S. Consovoy
Cameron T. Norris
Steven C. Begakis
CONSOVOY MCCARTHY PLLC
1600 Wilson Boulevard, Suite 700
Arlington, Virginia 22209
will@consovoymccarthy.com
cam@consovoymccarthy.com
steven@consovoymccarthy.com

John J. McKetta, III
Matthew C. Powers
William Christian
Marianne W. Nitsch
GRAVES DOUGHERTY, HEARON & MOODY, P.C.
401 Congress Avenue, Suite 2700
Austin, Texas 78701
(512) 480-5725 (phone)
(512) 539-9938 (fax)
mmcketta@gdhm.com
mpowers@gdhm.com
wchristian@gdhm.com
mnitsch@gdhm.com

/s/ Brian C. Pidcock
Brian C. Pidcock